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A Law Corporation

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FILED IN THE  
UNITED STATES DISTRICT COURT  
DISTRICT OF HAWAII

NOV 29 2007

at 1 o'clock and 25 min. P.M.  
SUE BEITIA, CLERK

Attys. for Plaintiff

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

MOTORS INSURANCE CORPORATION	)	Civil No.04-00724 HG/BMK
and BIG ISLAND TOYOTA,	)	
	)	PLAINTIFF'S REQUEST FOR
Plaintiffs,	)	DEFAULT JUDGMENT AGAINST
	)	DEFENDANTS AMERICAN TRANSPORT
vs.	)	CO. AND PIRELLI CABLE NORTH
	)	AMERICA, INC.; MEMORANDUM IN
YOUNG BROTHERS, LIMITED;	)	SUPPORT OF MOTION; DECLARATION
HAWAIIAN ELECTRIC COMPANY,	)	OF COUNSEL; EXHIBITS 1-4;
INC.; AMERICAN PACIFIC	)	CERTIFICATE OF SERVICE
TRANSPORT CO., LTD.; PIRELLI	)	
CABLE NORTH AMERICA, INC.,	)	
	)	
Defendants.	)	

**PLAINTIFFS' REQUEST FOR DEFAULT JUDGMENT AGAINST DEFENDANTS**  
**AMERICAN PACIFIC TRANSPORT CO. AND**  
**PIRELLI CABLE NORTH AMERICA, INC.**

COME NOW Plaintiffs MOTORS INSURANCE CORPORATION and BIG ISLAND TOYOTA and hereby move this Honorable Court for default judgment in the above-entitled action against Defendants AMERICAN PACIFIC TRANSPORT CO. (hereinafter "APT") and PIRELLI CABLE NORTH AMERICA, INC. (hereinafter "Pirelli") on the grounds that: 1) default was entered against APT on 9/14/06 and against Pirelli on 12/7/06 for failure to answer or otherwise defend against either Plaintiff's Complaint filed on 12/1/04 or

Plaintiff's First Amended Complaint filed 10/19/05; 2) APT and Pirelli have entered no appearance or moved to remove the respective entries of default; and 3) the amount of judgment is now certain. Further Defendants APT and Pirelli are individual companies and are not infants or incompetent persons.

WHEREFORE, MOTORS INSURANCE CORPORATION and BIG ISLAND TOYOTA request this Court to make and enter judgment on its Complaint and First Amended Complaint against APT and Pirelli in the amount of \$14,275.42, plus costs in the amount of \$579.68, as well as post-judgment interest, said amount reflects a credit of \$4,500 received from Defendant HAWAIIAN ELECTRIC COMPANY, INC.

This Motion is made pursuant to F.R.C.P. Rules 54 and 55, the memorandum in support, declaration of counsel, and the exhibits attached hereto as well as the records and files herein.

DATED: Honolulu, Hawaii, November 29, 2007.



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GREG NISHIOKA  
Atty. for Plaintiffs